

Fill in this information to identify the case:

Debtor 1 John R. Clemens

Debtor 2 \_\_\_\_\_  
(Spouse, if filing)

United States Bankruptcy Court for the: Western District of Pennsylvania  
(State)

Case number 12-20747-CMB

Form 4100R

## Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

### Part 1: Mortgage Information

Name of creditor: PNC Bank NA Court claim no. (if known): 11-1

Last 4 digits of any number you use to identify the debtor's account: 8839

Property address: 223 Hooks Lane  
Number Street

Canonsburg, PA 15317  
City State ZIP Code

### Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

### Part 3: Postpetition Mortgage Payment

Check one:

- ☒ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on: 07 / 02 / 2017  
MM / DD / YYYY

- ☐ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$ \_\_\_\_\_
- b. Total fees, charges, expenses, escrow, and costs outstanding: + (b) \$ \_\_\_\_\_
- c. Total. Add lines a and b. (c) \$ \_\_\_\_\_

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

MM / DD / YYYY

Debtor 1 John R. Clemens Case number (if known) 12-2074-CMB  
First Name Middle Name Last Name

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.

Check the appropriate box::

- ☐ I am the creditor.
- ☒ I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

X /s/ Brett A. Solomon  
Signature

Date 07 / 31 / 2017

Print Brett A. Solomon  
First Name Middle Name Last Name

Title Attorney

Company Tucker Arensberg, P.C.

If different from the notice address listed on the proof of claim to which this response applies:

Address 1500 One PPG Place  
Number Street  
Pittsburgh, PA 15222  
City State ZIP Code

Contact phone (412) 566 - 1212

Email bsolomon@tuckerlaw.com

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	Bankruptcy No. 12-20747-CMB
John R. Clemens	:	
	:	
Debtor	:	Chapter 13
	:	
Ronda J. Winnecour, Trustee	:	Related to Document No. 98
	:	
Movant	:	
	:	
v.	:	
	:	
PNC Bank NA	:	
	:	
Respondent	:	

**CERTIFICATE OF SERVICE OF RESPONSE TO NOTICE OF FINAL CURE PAYMENT**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on July 31, 2017.

The type(s) of service made on the parties (first-class mail, electronic notification, hand delivery, or another type of service) was first class mail.

John R. Clemens, 233 Hooks Lane, Canonsburg, PA 15317

Shawn N. Wright, Esq., 7240 McKnight Road, Pittsburgh, PA 15237

Ronda J. Winnecour, Esq., Suite 3250, USX Tower, 600 Grant Street, Pittsburgh, PA 15219

Office of the U.S. Trustee, 1001 Liberty Avenue, Suite 970, Pittsburgh, PA 15222

EXECUTED ON: 7/31/17

By: s/ Brett Solomon  
Brett A. Solomon, Esquire  
Pa. I.D. #83746  
bsolomon@tuckerlaw.com  
TUCKER ARENSBERG, P.C.  
1500 One PPG Place  
Pittsburgh, Pennsylvania 15222  
412-566-1212